

Environmental Protection Agency Internet Information

EPA Region 2

While Freedom of Information Act (FOIA) requests will be honored by directly writing to Region 2, EPA provides an increasing amount of environmental media information, and other Regional activities via Internet at <http://www.epa.gov>.

Region 2 has provided a FOIA Web site <http://www.epa.gov/region02/foia/> with several online databases from which the environmental information can be retrieved.

- **"Frequently FOIAed Files"** Web site <http://www.epa.gov/region02/foia/fff.htm> covers RCRA and many other media Programs. Through this Web site, you can learn about each media Program, associated databases, and special points of interest. In particular, the ability to "directly download" all of the most commonly requested Region 2 Export Files (.xls) and Reports (.pdf) - all compressed for quicker downloading.

EPA Region 2 has established a **list of contaminated facilities** that are a high priority for cleanup in New York, New Jersey, Puerto Rico and the U.S. Virgin Islands. You can view each facility fact sheet at <http://www.epa.gov/region02/cleanup/sites/>

EPA- Headquarters

- **Envirofacts Data Warehouse** Web site <http://www.epa.gov/enviro/index.html> is a one-stop source to the environmental information. This Web site provides access to several EPA databases with information about environmental activities that may affect air, water and land anywhere in the United States.
- **"My Environment"** Web site <http://www.epa.gov/myenvironment> is a powerful tool that provides a wide range of federal, state and local information about environmental conditions and futures in an area of your choice.
- **The Enforcement and Compliance History Online (ECHO)** Web site <http://www.epa.gov/echo/> provides a list of all inspections and enforcement under most of the environmental statutes.
- **Right-To-Know Network (RTK Net)**, a non-EPA Web site <http://www.rtknet.org/> on-line query engine provides free access to numerous databases and resources on environment.
- **National Biennial RCRA Hazardous Waste Report** Web site <http://www.epa.gov/epaoswer/hazwaste/data/biennialreport/index.htm> provides documents and data on hazardous waste reports.
- **Conditionally Exempt Small Quantity Generators** Web site <http://www.epa.gov/osw/hazard/generation/cesqg.htm> provides information on Conditionally Exempt Small Quantity Generators.

RCRARep Handler Detail Report

Report run on: October 28, 2011 9:23 AM

Facility Information

ID / Dist	Name / Location Address ...	County	Regulated Activity
NJR000035865	FERRO CORPORATION 170 ROUTE 130 SOUTH P.O. BOX 309 BRIDGEPORT NJ 08014 GPRA: Permit CorrectiveAction	GLOUCESTER	LG -----

Current Federal Activities

Hazardous Waste Large Quantity Generator

Other State Interests

-State Not a generator, Verified

Permitting/Closure Universes

GPRA Permit (controls in place)

Permit Progress (Storage Treatment)

Corrective Action Universes

GPRA Corrective Action

Sources Overwritten Prior to 2001 (before RCRA kept history for activity/address/contact)

02/23/10 B Notification
03/05/08 R 07 Biennial
01/01/07 I State/EPA
03/01/06 R 05 Biennial
02/28/06 I State/EPA
03/19/04 R 03 Biennial
02/21/02 R 01 Biennial
07/19/00 N Notification

Previous/Other Site Name

07/19/00 Notification FERRO CORP

Location Address

02/23/10 Notification	170 ROUTE 130 SOUTH P.O. BOX 309 GLOUCESTER (NJ015) BRIDGEPORT, NJ 08014 Land Type: Private (P)
01/01/07 State/EPA	170 ROUTE 130 SOUTH P.O. BOX 309 GLOUCESTER (NJ015) BRIDGEPORT, NJ 08014 State District: SOUTHERN Land Type: Private (P)
02/28/06 State/EPA	170 ROUTE 130 SOUTH P.O. BOX 309 GLOUCESTER (NJ015) BRIDGEPORT, NJ 08014 State District: - Land Type: Private (P)

RCRAREp Handler Detail Report

Report run on: October 28, 2011 9:23 AM

NJR000035865

Location Address

03/19/04 03 Biennial P.O. BOX 309
ROUTE 130 SOUTH
GLOUCESTER (NJ015)
BRIDGEPORT, NJ 08014
Land Type: Private (P)
07/19/00 Notification RTE 130 S & CENTER SQ .25 MI N
MILE MARKER 9.5
GLOUCESTER (NJ015)
BRIDGEPORT, NJ 08014
State District: SOUTHERN
Land Type: Private (P)

North American Industrial Classification (NAICS)

02/23/10 Notification 325199
03/05/08 07 Biennial 325199
01/01/07 State/EPA 325199
03/01/06 05 Biennial 325199
02/28/06 State/EPA 325199
03/19/04 03 Biennial 325199
02/21/02 01 Biennial 325199

325199 ALL OTHER BASIC ORGANIC CHEMICAL MANUFACTURING

Mailing Address

02/23/10 Notification 170 ROUTE 130 SOUTH
P.O. BOX 309
BRIDGEPORT, NJ 08014
01/01/07 State/EPA 170 ROUTE 130 SOUTH
P.O. BOX 309
BRIDGEPORT, NJ 08014
03/19/04 03 Biennial P.O. BOX 309
ROUTE 130 SOUTH
BRIDGEPORT, NJ 08014
07/19/00 Notification PO BOX 309
BRIDGEPORT, NJ 080140309

Contact

02/23/10 Notification KAREN M ANTHONY
170 ROUTE 130 SOUTH
P.O. BOX 309
BRIDGEPORT, NJ 08014
Phone: (856)467-8363
eMail: ANTHONYK@FERRO.COM
02/28/06 State/EPA KAREN M ANTHONY
170 ROUTE 130 SOUTH
BRIDGEPORT, NJ 08014
Phone: (856)467-8363
eMail: ANTHONYK@FERRO.COM

RCRARep Handler Detail Report

Report run on: October 28, 2011 9:23 AM

NJR000035865

Contact

03/19/04 03 Biennial CHARLES M EVANS
Phone: (856)467-8266
eMail: EVANSC@FERRO.COM
07/19/00 Notification CHARLES EVANS
PO BOX 309
BRIDGEPORT, NJ 080140309
Phone: (856)467-8266

Legal Owner/Operator of Site

02/23/10 Notification Current Operator from 08/18/2000 -
FERRO CORPORATION (Private)

01/01/07 State/EPA Current Operator from 08/18/2000 -
NO NAME FOUND (Private)

Notes: This record created to coincide with EPA Mass Update for 01/
01/2007 on Rundate: 06/11/2008

03/01/06 05 Biennial Current Operator from 08/18/2000 -
FERRO CORPORATION (Private)

07/19/00 Notification Current Owner from -
FERRO CORP (Private)
1000 LAKESIDE AVE
CLEVELAND, OH 44113
Phone: (216)750-6763

Regulated Hazardous Waste Activities

02/23/10 Notification
Federal Large Quantity Generator
State Not a generator, Verified
Said is not a TSD. Agency gets TSD from Permit Units in PMT Module.

03/05/08 07 Biennial
Federal Large Quantity Generator
Said is not a TSD. Agency gets TSD from Permit Units in PMT Module.

01/01/07 State/EPA
Federal Large Quantity Generator
Said is a TSD. Agency gets TSD from Permit Units in PMT Module.

03/01/06 05 Biennial
Federal Large Quantity Generator
Said is a TSD. Agency gets TSD from Permit Units in PMT Module.

02/28/06 State/EPA
Federal Large Quantity Generator
Said is a TSD. Agency gets TSD from Permit Units in PMT Module.

03/19/04 03 Biennial

RCRARep Handler Detail Report

Report run on: October 28, 2011 9:23 AM

NJR000035865

Regulated Hazardous Waste Activities

Federal Large Quantity Generator
Said is a TSD. Agency gets TSD from Permit Units in PMT Module.
02/21/02 01 Biennial
Federal Large Quantity Generator
Said is a TSD. Agency gets TSD from Permit Units in PMT Module.
07/19/00 Notification
Federal Large Quantity Generator
Said is a TSD. Agency gets TSD from Permit Units in PMT Module.

Waste Codes

02/23/10 Notification	D001	D002	D006	D007	D008	D009	D018	D038
	D039	D040	F005	K015	P028	U057	U123	U188
	U190	U220						
03/05/08 07 Biennial	D001	D002	D009	D019	D035	K015	P028	U188
	U190	U220						
03/01/06 05 Biennial	D001	D002	D009	D018	K015	U190		
02/28/06 State/EPA	D001	D002	D009	D018	K015	U190		
03/19/04 03 Biennial	D001	D002	D005	D009	K015	P028	U190	
02/21/02 01 Biennial	D001	D002	D009	D011	D039	F005	K015	P028
	U188	U190						
07/19/00 Notification	D001	D002	D009	D018	F003	F005	K015	P028
	U188	U190						

D001	IGNITABLE WASTE
D002	CORROSIVE WASTE
D005	BARIUM
D006	CADMIUM
D007	CHROMIUM
D008	LEAD
D009	MERCURY
D011	SILVER
D018	BENZENE
D019	CARBON TETRACHLORIDE
D035	METHYL ETHYL KETONE
D038	PYRIDINE
D039	TETRACHLOROETHYLENE
D040	TRICHLORETHYLENE
F003	THE FOLLOWING SPENT NONHALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE , ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NONHALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NONHALOGENATED SOLVENTS, AND A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.
F005	THE FOLLOWING SPENT NONHALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE,

RCRARep Handler Detail Report

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NJR000035865

Waste Codes

CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NONHALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

K015 STILL BOTTOMS FROM THE DISTILLATION OF BENZYL CHLORIDE.

P028 BENZENE, (CHLOROMETHYL)- (OR) BENZYL CHLORIDE

U057 CYCLOHEXANONE (I)

U123 FORMIC ACID (C,T)

U188 PHENOL

U190 1,3-ISOBENZOFURANDIONE (OR) PHTHALIC ANHYDRIDE

U220 BENZENE, METHYL- (OR) TOLUENE

Certification

02/23/10 Notification	PLANT MANAGER FRANK P CESARE Signed: 02/22/10
03/05/08 07 Biennial	PLANT MANAGER FRANK PROLIZO Signed: 03/05/08
01/01/07 State/EPA	BRS-MANIFEST MASS UPDATE Signed: 01/01/07
03/01/06 05 Biennial	PLANT MANAGER JOHN A AMBROSE Signed: 03/01/06
02/28/06 State/EPA	BRS CYCLES 2001 2003 2005 BRS 2001 2003 2005 Signed: 02/28/06
03/19/04 03 Biennial	PLANT MANAGER JOHN A AMBROSE Signed: 03/19/04
02/21/02 01 Biennial	PLANT MANAGER SCOTT A ZURICH Signed: 02/21/02

Biennial Reports Included/Excluded in Reports

02/23/10 Notification	Site's Biennial Report data included in	2009 BR National report.
03/05/08 07 Biennial	Site's Biennial Report data included in	2007 BR National report.
03/01/06 05 Biennial	Site's Biennial Report data included in	2005 BR National report.
03/19/04 03 Biennial	Site's Biennial Report data included in	2003 BR National report.
02/21/02 01 Biennial	Site's Biennial Report data included in	2001 BR National report.

FERRO CORPORATION

BRIDGEPORT

NJR000035865

Last Updated By: RFZ

Last Updated On: 10/22/2004 03:31:46

The following series is available for updating:

Seq. No: 1	Series Name: PERMIT
Responsible Person: Abdellatif, Sameh M - R2SA	

Notes:	1828 Chars. Remaining
FERRO TOOK OVER THE PERMITTED STORAGE UNITS FROM SOLUTIA NJD001700707. SOLUTIA ORIGINALLY OWNED THE ENTIRE PROPERTY BEFORE IT WAS SPLIT IN TWO. SOLUTIA KEEPS THE LANDFIL.	

[Save Series](#) [Continue](#) [Delete](#) [Back to Series List](#)

URL: /rcrainfo/pmt/PMT_series_upd.jsp



Event List for Series Update



FERRO CORPORATION

BRIDGEPORT

NJR000035865

[Add New Event](#) [Back to Series List](#)

Series Information

Series Name	Responsible Person	Notes
PERMIT	R2SA	FERRO TOOK OVER THE PERMITTED STORAGE UNITS FROM SOLUTIA NJD001700707. SOLUTIA ORIGINALLY OWNED THE ENTIRE PROPERTY BEFORE IT WAS SPLIT IN TWO. SOLUTIA KEEPS THE LANDFIL.

Select the Event to process:

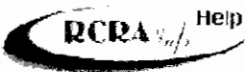
Activity Location	Event Seq#	Event Code - Desc	Orig Scheduled Date	New Scheduled Date	Actual Date	Resp Agency
NJ	1	CL380CA - CLOSURE VERIFICATION-CLEAN CLOSURE ACCEPTABLE			01/23/2006	S
NJ	1	CL370 - RECEIVE CLOSURE CERTIFICATION			10/21/2005	S
NJ	1	QP270 - PERMIT EXPIRATION DATE			06/01/2004	S
NJ	1	OP315 - INTENDS TO CLOSE PERMITTED UNITS			12/12/2003	S
NJ	1	QP205 - FINAL PERMIT EFFECTIVE			06/01/1999	S
NJ	1	OP200PI - FINAL DETERMINATION-RCRA PERMIT ISSUED, HSWA NOT APPLIC.			04/22/1999	S

[Add New Event](#) [Back to Series List](#)

URL: /rcrainfo/pmt/PMT_series_event_upd.jsp



Unit List



FERRO CORPORATION

BRIDGEPORT

NJR000035865

Hide All Details

3 Unit(s) found.

								Go To	
Unit Seq		Unit Name						Detail Count	
1		CONTAIN2						3	Hide Details
	Detail Seq	Effective Date	Process Code	Capacity	UOM	Capacity Type	Leg/Op Status Code	Leg/Op Status Code Description	
	3	01/23/2006	S01	50000	G	D	PTCC	PERMIT TERMINATED/PERMIT EXPIRED, NOT CONTINUED - CLEAN CLOSED	
	2	10/21/2005	S01	50000	G	D	PIIN	PERMITTED - INACTIVE/CLOSING, BUT NOT YET RCRA CLOSED	
	1	04/22/1999	S01	50000	G	P	PIOP	PERMITTED - OPERATING, ACTIVELY MANAGING RCRA-REGULATED WASTE	
Unit Seq		Unit Name						Detail Count	
2		TANK1						3	Hide Details
	Detail Seq	Effective Date	Process Code	Capacity	UOM	Capacity Type	Leg/Op Status Code	Leg/Op Status Code Description	
	3	01/23/2006	S02	72000	G	D	PTCC	PERMIT TERMINATED/PERMIT EXPIRED, NOT CONTINUED - CLEAN CLOSED	
	2	10/21/2005	S02	72000	G	D	PIIN	PERMITTED - INACTIVE/CLOSING, BUT NOT YET RCRA CLOSED	
	1	04/22/1999	S02	72000	G	P	PIOP	PERMITTED - OPERATING, ACTIVELY MANAGING RCRA-REGULATED WASTE	
Unit Seq		Unit Name						Detail Count	
3		TANKTRT1						3	Hide Details
	Detail Seq	Effective Date	Process Code	Capacity	UOM	Capacity Type	Leg/Op Status Code	Leg/Op Status Code Description	
	3	01/23/2006	T01	20000	U	D	PTCC	PERMIT TERMINATED/PERMIT EXPIRED, NOT CONTINUED - CLEAN CLOSED	
	2	10/21/2005	T01	20000	U	D	PIIN	PERMITTED - INACTIVE/CLOSING, BUT NOT YET RCRA CLOSED	
	1	04/22/1999	T01	20000	U	P	PIOP	PERMITTED - OPERATING, ACTIVELY MANAGING RCRA-REGULATED WASTE	

URL: /rcrainfo/pmt/PMT_unit_showall.jsp



State of New Jersey

Department of Environmental Protection

Richard J. Codey
Acting Governor

Bradley M. Campbell
Commissioner

Solid and Hazardous Waste Management Program
Bureau of Solid and Hazardous Waste Permitting - South
401 East State Street, P.O. Box 414
Trenton, New Jersey 08625-0414
Tel. # (609) 292-9880
Fax # (609) 633-9839
<http://www.state.nj.us/dep/dshw>

NJR 000035865

1000 2 8 2005 CP550

Ralph J. Nylund
Environmental Engineering Specialist
Ferro Corporation.
P.O. Box 309
Bridgeport, NJ 08014

RE: Acceptance of Closure Certification for Hazardous Waste Container Storage Area and BDEA Tank, and Termination of Hazardous Waste Storage Facility Status, Ferro Corporation – Delaware River Plant, Bridgeport, Gloucester County, EPA ID No. NJR 000035865, Permit No. 0809A1HP03

Dear Mr. Nylund:

The Bureau of Solid and Hazardous Waste Permitting South (Bureau) is in receipt of your submittal dated June 24, 2005, concerning the above referenced facility.

The submittal included the following:

- RCRA Closure of Container Storage Area and Benzyl Diethylamine Residue (BDEA) Tank, dated October 2005, and prepared by Terranear PMC.
- Certification dated October 12, 2005, signed and sealed by Walter J. Wujcik, New Jersey registered professional engineer; and
- Owner/Operator Certification dated October 21, 2005, signed by John Ambrose, Plant Manager, Ferro Corporation – Delaware River Plant.

The Bureau has completed a review of the report and certifications and conducted an inspection of the hazardous waste container storage area and the BDEA tank on November 30, 2005. Based on these submittals and inspection, the Bureau has determined that the hazardous waste container storage area and the BDEA tank have been clean closed in accordance with the approved closure plan. Because the container storage area and the BDEA tank were the only remaining authorized storage areas in the hazardous waste facility, Ferro Corporation is no longer authorized to store hazardous waste. Ferro Corporation may continue to accumulate hazardous waste for ninety (90) days or less in the above areas, subject to compliance with the standards detailed in 40 CFR 262.

Site History

Based on a review of its files, the Bureau has determined that by filing a Part A Hazardous waste Permit Application on November 11, 1980, Monsanto Company (a previous owner/operator of the facility) applied for authorization to conduct the following hazardous waste activities: S01 (container storage), S02 (tank storage), T01 (treatment in tank), and D02 (landfill disposal).

The T01 activity pertained to the wastewater treatment plant at the site and was therefore, not subject to hazardous waste permitting requirements. The hazardous waste landfill (D02) has been subject to closure and post-closure activities since a Closure and Post-Closure Plan Approval was issued by the Bureau on March 10, 1988. The S01 and S02 activities were included in the hazardous waste facility permit issued to Monsanto Company on June 30, 1988, renewed on January 20, 1994, and incorporated by the Department of Environmental Protection (Department) into the Facility-Wide Permit No. NJ00012, issued on April 22, 1999.

On May 30, 1997, Monsanto notified the Bureau of a corporate restructuring by which Monsanto Company was divided into two (2) separate companies, namely Monsanto Company and Solutia, Inc., with Solutia, Inc., taking over the operations at the Bridgeport site. A Class 1 Modification was issued by the Department on September 30, 1997 to reflect the business name change and transfer of the permit to Solutia, Inc. Effective on August 18, 2000, Ferro Corporation acquired portions of the facility which included all the tank and container storage areas (discussed below), while Solutia, Inc., retained the landfill and its ongoing closure/post-closure activities. This change in ownership was reflected in the transfer of the Facility-Wide Permit to Ferro Corporation by the permit modification issued on August 17, 2000.

Hazardous Waste Storage Units

The hazardous waste facility permit issued on June 30, 1988, authorized hazardous waste storage activities in the following units. Following each unit is the current hazardous waste regulatory status:

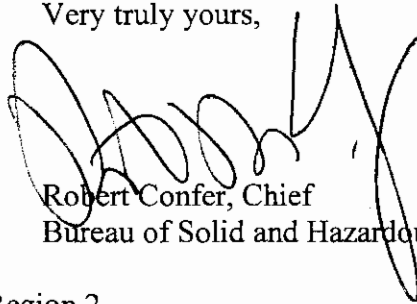
1. Steamer Overheads Tank (15,000 gallons) and Phosphate Esters Steamer Overheads Tank (6,000 gallons) – On June 29, 1993, the Bureau determined that these two (2) units were process tanks and therefore exempt from permitting.
2. Vertical Benzyl Chloride Storage Tank (14,000 gallons) – This unit was closed in accordance with the closure plan approved in the permit. The Bureau accepted the closure certification on February 14, 1995.
3. Horizontal Benzyl Chloride Storage Tank (15,000 gallons) – This unit was closed in accordance with the closure plan approved in the permit. The Bureau accepted the closure certification on January 31, 2000.
4. BDEA Bottoms Storage Tank (6,900 gallons) – As previously discussed in this letter, clean closure of this unit was completed in accordance with the closure plan approved in the permit.

5. Container Storage Area (23,100 gallons) – As previously discussed in this letter, clean closure of this unit was completed in accordance with the closure plan approved in the permit.

As a result, the Bureau has determined that all of the hazardous waste facility activities at Ferro Corporation have been closed or determined not to be subject to hazardous waste permitting requirements. Therefore, Ferro Corporation's status as a hazardous waste storage facility is hereby terminated, and the facility has been removed from the Bureau's list of hazardous waste facilities.

If you have any questions regarding this matter, please contact Nicholas Nader of my staff at (609) 984-2067 or at nicholas.nader@dep.state.nj.us.

Very truly yours,



Robert Confer, Chief
Bureau of Solid and Hazardous Waste Permitting South

c: Barry Tornick, USEPA - Region 2
Pete Taylor, BHWCE - Southern Region
Mike Digiore, OPPRTK
Scot Frow, BSHWPN
Nicholas Nader, BSHWPS

Document: Closure Cert Response



POLYMER ADDITIVES DIVISION
FERRO CORPORATION
DELAWARE RIVER PLANT
P.O. BOX 309
BRIDGEPORT, NEW JERSEY 08014
TELEPHONE: (856) 467-3000

February 17, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
Receipt No. 7003 1010 0001 6622 2650

Mr. Anthony Fontana, Chief
New Jersey Department of Environmental Protection
Bureau of Hazardous Waste & Transfer Facilities
Hazardous Waste Facility Section
401 East State Street
Post Office Box 414
Trenton, New Jersey 08625-0414

Reference: RCRA Permit Application Extension
EPA ID No. NJR 000035865

Dear Mr. Fontana,

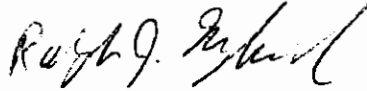
I'm writing to request an extension of the application deadline for Ferro Corporation's RCRA Part B permit. Charlie Evans and myself met with Mr. Gerchman and Mr. Billah of your staff and Ms. Davis of the Facility Wide Permit group on October 16th 2003. We scheduled the meeting to review some pre-application questions that we had. During the meeting the question of our need for this permit came up. We had to agree that it didn't appear that we needed this permit, but we had to check with our corporate management to get approval to proceed with the closure. We came away from that meeting with the impression that we could apply for an application filing extension and submit the closure plan. This would allow us to get agreement from NJDEP on the requirements of the closure plan and then decide if it was in Ferro Corporation's best interest to renew the application or close it. This is what we presented to our management and got approval to do.

We submitted the request for extension of the application filing date and the Closure Plan to you. I guess since you weren't at the meeting our submitting both documents to you didn't make sense, and I have to admit that the details of the discussions we had at that meeting were not included in the submittals. At this time I'm requesting that we get back on track with what was discussed at the meeting and what we got approval from our management to do. Please grant us an extension of the filing date of our RCRA Part B permit renewal application to a date far enough in the future so that agreement on the closure plan can be completed and Ferro Corporation can decide which path is better. The duration of the extension depends on how long it will take NJDEP to review and comment on the Modified Closure plan that Ferro Corporation submitted.

Charlie and myself, here at the plant, find ourselves in a difficult position. We sold our management on the idea of looking into closure of our RCRA Part B permit in a way that didn't commit Ferro Corporation until we knew the details of the closure plan. But, apparently the DEP considers that we have already decided on closure. That is not the case, and we request that you grant the extension so that we still have the choice that we thought we were going to have after the Oct. 16th meeting.

Thank you very much for your consideration in this matter. Please contact me at 856-467-8306 if you have any questions concerning this request.

Sincerely,



Ralph J. Nylund
Environmental Engineering Specialist

Cc: Ms. Sharon Davis - NJDEP
Mr. Mike Gerchman - NJDEP
Mr. Charlie Evans - Ferro Corporation



State of New Jersey

Department of Environmental Protection
Division of Solid and Hazardous Waste

401 East State Street

P.O. Box 414

Trenton, New Jersey 08625-0414

Phone# (609) 292-9880

Fax# (609) 633-9839

James E. McGreevey
Governor

Bradley M. Campbell
Commissioner

JUL - 2 2003

Ralph Nylund
Process Engineering Specialist, Environmental
Ferro Corporation
Route 130 South
Bridgeport, NJ 08014

RE: Laboratory Certification for All Analyses Performed to Verify Compliance, Ferro Corporation, Bridgeport, EPA ID No. NJR 000 035 865, Hazardous Waste Facility (HWF) No. 0809A1

Dear Mr. Nylund:

This advisory letter is being sent to all hazardous waste facilities regarding the need to use certified laboratories for analyses performed to establish compliance with regulatory requirements.

The Regulations Governing the Certification of Laboratories and Environmental Measurements at N.J.A.C. 7:18-2.2(a) and (b) state the following:

- (a) No laboratory other than a certified environmental laboratory shall analyze samples for the purpose of establishing compliance with any regulatory program.
- (b) A certified environmental laboratory shall use only the methods listed on its Annual Certified Parameter List when analyzing samples for the purpose of establishing compliance with any regulatory program.

Therefore, any laboratory analysis performed to verify compliance with the solid or hazardous waste regulations or conditions of your facility's permit shall be conducted in compliance with the requirements specified in N.J.A.C. 7:18.

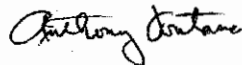
In order to determine whether hazardous waste facilities are in compliance with these regulations, the Bureau is requesting that you submit one of the following for your facility within thirty (30) days of the date of this letter:

- (1) A statement that the facility does not use laboratory analysis to verify compliance; or,

- (2) A statement that the facility is in compliance with the laboratory certification requirements of N.J.A.C. 7:18 for each method used to verify compliance; or,
- (3) A schedule to achieve compliance with the requirements of N.J.A.C. 7:18.

If you have any questions concerning this matter, please contact Zafar Billah of my staff at (609) 292-9880.

Very truly yours,



Anthony Fontana, Chief
Bureau of Hazardous Waste & Transfer Facilities

C: Mike Hastry, BHWC&E
Barry Tornick, EPA ✓
Michele Viventi, OPP

Doc: Ferro Lab Certification



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

**BY FACSIMILE AND
FIRST CLASS MAIL**

Mr. Robert F. Wilkinson
Thompson Coburn L.L.P.
One Firststar Plaza
St. Louis, Missouri 63101-1693

October 26, 2000

NJR 000035 865

Re: HSWA Permit No. NJD001700707
Solutia, Inc./ Ferro Corporation
Bridgeport, New Jersey

Dear Mr. Wilkinson:

I am authorized to write in response to your letter of October 2, 2000 requesting that EPA agree to approve a Class I Permit Modification of the existing EPA HSWA Permit for the above-referenced facility that will divide the Permit into two separate Permits, one solely to be the responsibility of Ferro and one solely to be the responsibility of Solutia.

Having carefully reviewed the matter, EPA has concluded that the existing Permit for the facility should remain in place, and Region 2 accordingly will not approve the requested Permit Modification.

As a result of the recently approved Class I Permit Modification, Solutia and Ferro are now co-permittees. Prior to completing the sale of part of the facility to Ferro, a Class I Permit Modification that will reflect the transaction by including Ferro as an owner of the facility should be submitted to EPA for approval.

In Section XIX of a revised Part A application to accompany such a Permit Modification request, the parties may set forth comments to describe the primary responsibilities of each company for the Permit obligations, and attach other documentation deemed relevant. Such comments and other documentation will become part of the active Permit file and assist EPA in Permit administration.

Sincerely

Robert G. Hazen

Assistant Regional Counsel
Waste & Toxic Substances Branch

bcc: Tornick
Nadai

Internet Address (URL) • <http://www.epa.gov>

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POLYMER ADDITIVES DIVISION
FERRO CORPORATION

7050 KRICK ROAD
WALTON HILLS, OHIO 44146-4494
TELEPHONE: (216) 641-8580
FACSIMILE: (216) 750-6729

August 10, 2000

IN DUPLICATE ORIGINALS

Ferro
NJR 000 035 865

Mr. Dennis L. Cavner
Vice President
Operations Excellence and
Environmental, Safety and Health
Solutia Inc.
575 Marysville Center Drive
St. Louis, Missouri 63141

RE: **Bridgeport, New Jersey Facility – Class I Modifications of Hazardous Waste and Solid Waste Amendments Permit (EPA ID No. NJD 001 700 707) ("HSWA Permit") and Hazardous Waste Facility Permit (New Jersey Facility No. 0809A1HPO3) as Incorporated within Facility Wide Permit NJ00012**

*It is
Solutia's
ID #*

Dear Mr. Cavner:

As you know, Ferro Corporation ("Ferro") and Solutia Inc. ("Solutia") (hereinafter together the "Parties"), have entered into an asset purchase agreement, which will provide for, among other transactions, Ferro's acquisition of equipment, buildings and other improvements at a portion of a facility located at U.S. Route 130 South, City of Bridgeport, County of Gloucester, State of New Jersey. This portion of the facility initially will be leased by Ferro and subsequently will be purchased by Ferro (the "Ferro Site"), subject to certain conditions. Solutia will maintain ownership and operational control of the remaining portion of the site, which includes Solid Waste Management Units ("SWMUs") No. 1,2,3,4,5,6, and 14 (See Attachment 1). The "Ferro Site" combined with the remaining portion of the site have been designated as the Facility by the United States Environmental Protection Agency, Region 2 ("USEPA"). Solutia and Ferro contemplate that the closing of the asset purchase agreement and leasehold will occur on August 18, 2000, subject to the satisfaction of applicable closing conditions ("Closing Date"). Ferro has been advised by the USEPA that Ferro is required to obtain a Class 1 Modification of the HSWA Permit in order for Ferro to commence operations after closing on August 18, 2000, in accordance with HSWA requirements. Without waiving any rights, Ferro and Solutia have agreed to submit this request for a Class 1 Modification.

In connection with Ferro's request for approval from the USEPA for Class I Modifications of the above-referenced permits, the applicable regulations (40 CFR §§ 270.40 – 270.42) require the Parties to enter into an agreement containing the specific date for the

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08/10/007:25 PM



establishment of certain shared permit responsibility. Therefore, this letter agreement is intended by the Parties to satisfy this regulatory requirement.

1. Sharing Permit Responsibility. Following the Closing Date, Ferro agrees to accept shared responsibility with Solutia for compliance with the above referenced permits until such time as the Facility is subdivided, resulting in the Ferro Site becoming a separate Facility from the remaining portion of the site owned by Solutia Inc.

2. Closing. On or about August 18, 2000, Ferro will acquire certain equipment, buildings, and other improvements, and lease a related portion of the real property underlying the Ferro Site, thus becoming an operator of the Facility, according to USEPA. This shall occur as soon as reasonably practicable after the satisfaction of all applicable conditions to closing. The Parties anticipate that such closing conditions will be satisfied by August 18, 2000. The Parties shall promptly notify the USEPA in the event the closing does not occur on August 18, 2000, and upon Ferro's occupation and acquisition of the foregoing property.

3. Financial Requirements. Pursuant to the Resource Conservation and Recovery Act ("RCRA") permit modification rules promulgated at 40 C.F.R. § 270.40, the Parties shall comply with 40 CFR Part 264 Subpart H ("Financial Requirements"), or the authorized New Jersey counterpart. Solutia agrees to demonstrate compliance with the Financial Requirements during the period of time that Ferro and Solutia are co-permittees and share responsibility for the above referenced Facility permits.

If you are in agreement with the above, please acknowledge such agreement by signing below and returning one copy of this letter to me, whereupon this letter agreement shall constitute a legal, valid and binding obligation between the Parties.

Very truly yours,

FERRO CORPORATION

By: Edward S. Frindt, Jr.

Printed Name: Edward S. Frindt, Jr.
Title: North American Manufacturing
Director

Agreed this 10th day of August, 2000

SOLUTIA INC.

By: _____

Printed Name: Dennis L. Cavner
Title: Vice President -
Operations Excellence and
Environmental, Safety and Health

cc: Mr. David Krawczyk
Mr. Richard A. Santo, Jr.
Elton Parker, Esquire
Ellen Radow Sadat, Esquire
Robert F. Wilkinson, Esquire

Attachment 1

SWMU No. 1	Past Disposal Area #1
SWMU No. 2	Past Disposal Area #2
SWMU No. 3	Past Disposal Area #3
SWMU No. 4	Phenol Equalization Lagoon (PEL)
SWMU No. 5	Sludge Lagoon No. 3
SWMU No. 6	Sludge Lagoon No. 4
SWMU No. 14	East Landfill

Hazardous Waste Permit

Application

Part A

(Read the instructions before starting)

Date Received

Month Day Year

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Part A Submission

☒

B. Part A Amendment #

C. Installation's EPA ID Number

D. Secondary ID Number (If applicable)

NJD 001-700 707

NJR 000 035865

II. Name of Facility

Ferro Corporation

Route 130 South a CENTER SQ. 25MIN

III. Facility Location (Physical address not P.O. Box or Route Number)

A. Street

Street (Continued)

City or Town

State

Zip Code

Bridgeport

NJ

08014

County Code
(if known)

County Name

Gloucester

B. Land Type

C. Geographic Location

D. Facility Existence Date

(Enter code)

P

LATITUDE (Degrees, Minutes, & Seconds) LONGITUDE (Degrees, Minutes & Seconds)

39-47'30"

75-23'45"

Month Day Year

11/19/61

IV. Facility Mailing Address

Street or P.O. Box

Route 130 South P. O. Box 309

City or Town

State

Zip Code

Bridgeport

NJ

08014

V. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (Last)

(First)

Evans

Charles

Job Title

Phone Number (Area Code and Number)

Sr. Environmental Specialist

856-467-8266

VI. Facility Contact Address (See instructions)

A. Contact Address

B. Street or P.O. Box

Location Mailing Other

X X

City or Town

State

Zip Code

Name of Operator				
Ferro Corporation				
Street or P.O. Box 1000 Lakeside Avenue				
City or Town Cleveland			State OH	ZIP Code 44113
Phone Number (Area Code and Number)		B. Operator Type <div style="border: 1px solid black; padding: 2px; display: inline-block;">P</div>	C. Change of Operator Indicator Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Date Changed Month Day Year 08 / 18 / 00
VIII. Facility Owner (See Instructions)				
A. Name of Facility's Legal Owner				
Solutia, Inc.				
Street or P.O. Box				
575 Maryville Center Drive, Mail Zone 6-S				
City or Town St. Louis,			State MO	ZIP Code 63141
Phone Number (Area Code and Number)		B. Owner Type <div style="border: 1px solid black; padding: 2px; display: inline-block;">P</div>	C. Change of Owner Indicator Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Date Changed Month Day Year / /
IX. SIC Codes (4-digit, in order of significance)				
Primary		Secondary		
2865	(Description) Organic Chemicals	(Description)		
Secondary		Secondary		
2812	(Description) Inorganic Chemicals	(Description)		
X. Other Environmental Permits (See Instructions)				
A. Permit Type (Enter code)		B. Permit Number		C. Description
<div style="display: flex; flex-direction: column; align-items: center;"> <div>N</div> <div>E</div> <div>P</div> <div>E</div> </div>	NJD 0005045 (NJ00012)		NJPDES Discharge to surface water	
	No. 0809A1HP03		New Jersey Hazardous Waste Facility	
	NJD 001 700 707		HWSA Permit EPA Reg. II	
	NJ 00012		Facility Wide Permit	
	NJ 00012		Numerous state permits to operate air emission control devices	
	2099P (NJ 00012)		Water diversion permit	

VII. Operator Information (See Instructions)

Name of Operator			
Ferro Corporation			
Street or P.O. Box 1000 Lakeside Avenue			
City or Town Cleveland		State OH	ZIP Code 44113
Phone Number (Area Code and Number)	B. Operator Type P	C. Change of Operator Indicator Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Date Changed Month Day Year 08 / 18 / 00

VIII. Facility Owner (See Instructions)

A. Name of Facility's Legal Owner			
Ferro Corporation			
Street or P.O. Box 1000 Lakeside Avenue			
City or Town Cleveland		State OH	ZIP Code 44113
Phone Number (Area Code and Number)	B. Owner Type P	C. Change of Owner Indicator Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Date Changed Month Day Year 08 / / 00

IX. SIC Codes (4-digit, in order of significance)

Primary		Secondary	
2865	(Description) Organic Chemicals		(Description)
Secondary		Secondary	
2812	(Description) Inorganic Chemicals		(Description)

X. Other Environmental Permits (See Instructions)

A. Permit Type (Enter code)	B. Permit Number	C. Description
N	NJD 0005045 (NJ00012)	NJPDES Discharge to surface water
	No. 0809A1BP03	New Jersey Hazardous Waste Facility
	NJD 001 700 707	HSWA Permit EPA Reg. II
E	NJ 00012	Facility Wide Permit
E	NJ 00012	Numerous state permits to operate air emission control devices
E	2099P (NJ 00012)	Water diversion permit

XI. Nature of Business (Provide a brief description)

Facility produces organic chemicals for internal use and sales. Principle products are Phthalate and Phosphate Ester Plasticizers, Benzyl Chloride, Hydraulic Fluids and Tetrachlorophthalic Anhydride and inorganic product, Hydrochloric Acid is also produced.

XII. Process Codes and Design Capacities

- A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item XIII.
- B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.
1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Disposal; Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
D80	Landfill	Acres or Hectares	T88	Titanium Dioxide Chloride Process	
D81	Land Treatment	Acres or Hectares	T89	Oxidation Reactor	
D82	Ocean Disposal	Gallons Per Day; Liters Per Day	T90	Methane Reforming Furnace	
D83	Surface Impoundment	Gallons or Liters	T91	Palping Liquor Recovery Furnace	
D99	Other Disposal	Any Unit of Measure Listed Below	T92	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S01	Storage; Container (Barrel, Drum, Etc.)	Gallons or Liters	T93	Halogen Acid Furnaces	
S02	Tank	Gallons or Liters	T94	Other Industrial Furnaces Listed In 40 CFR §260.10	
S03	Waste Pile	Cubic Yards or Cubic Meters	T99	Containment Building-Treatment	
S04	Surface Impoundment	Gallons or Liters	X01	Miscellaneous (Subpart X): Open Burning/Open Detonation	
S05	Drip Pad	Gallons or Liters	X02	Mechanical Processing	Any Unit of Measure Listed Below Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour Cubic Yards or Cubic Meters Any Unit of Measure Listed Below
S06	Containment Building-Storage	Cubic Yards or Cubic Meters	X03	Thermal Unit	
S99	Other Storage	Any Unit of Measure Listed Below	X04	Geologic Repository	
T01	Treatment; Tank	Gallons Per Day or Liters Per Day	X99	Other Subpart X	
T02	Surface Impoundment	Gallons Per Day or Liters Per Day			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour			
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T80	Boller	Gallons or Liters			
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T84	Phosphate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour.....	D	Cubic Yards.....	Y
Gallons Per Hour.....	E	Metric Tons Per Hour.....	W	Cubic Meters.....	C
Gallons Per Day.....	U	Short Tons Per Day.....	N	Acres.....	B
Liters.....	L	Metric Tons Per Day.....	S	Acres-foot.....	A
Liters Per Hour.....	H	Pounds Per Hour.....	J	Hectares.....	Q
Liters Per Day.....	V	Kilograms Per Hour.....	R	Hectare-meter.....	F
				Btu's Per Hour.....	I

XII. Process Codes and Design Capabilities(Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only			
					1. Amount (Specify)	2. Unit Of Measure (Enter code)					
X 1	S	0	2		533,788	G	001				
X 1	S	0	1		15,400	G	001				
X 2	S	0	2		6,900	G	001				
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item XIII.

XIII. Other Processes(Follow instructions from Item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter the last two digits)	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
					1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	T	0	4					In-situ Verification
1								
2								
3								
4								

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER** Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** -For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item XIV-D(1).
- Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS									
				(1) PROCESS CODES (Enter code)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))				
X 1	K 0 5 4	900	P	T	0	3	D	8	0				
X 2	D 0 0 2	400	P	T	0	3	D	8	0				
X 3	D 0 0 1	100	P	T	0	3	D	8	0				
X 4	D 0 0 2												Included With Above

XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES										
	(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION (If a code is not entered in D(1))										
1	D	0	0	1	2.0x10 ⁶	P	S	0	2								
2	F	0	3	9	4.0x10 ⁶	P											Landfill Leachate
3	K	0	1	5	0.7x10 ⁶	P	S	0	2								
4	D	0	3	2	0.2x10 ⁶	P	S	0	1								
5	P	0	2	8	50x10 ³	P	S	0	1								
6	U	1	9	0	10x10 ³	P	S	0	1								
7	U	1	8	8	1x10 ³	P	S	0	1								
8	D	0	0	2	1x10 ³	P	S	0	1								
9	D	0	0	9	1x10 ³	P	S	0	1								
10	D	0	1	8	1x10 ³	P	S	0	1								
11	F	0	0	3	20x10 ³	P	S	0	2								
12	F	0	0	5	10x10 ³	P	S	0	1								
13																	
14																	
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30																	
31																	
32																	
33																	

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature

Edward S. Frindt, Jr.

Date Signed

8-10-00

Name and Official Title (Type or print)

Edward S. Frindt, Jr. North American Manufacturing Director

Owner Signature

Date Signed

Name and Official Title (Type or print)

Dennis L. Cawner Vice President-Operations Excellence and Environmental, Safety and Health

Operator Signature

Edward S. Frindt, Jr.

Date Signed

Name and Official Title (Type or print)

Edward S. Frindt, Jr. North American Manufacturing Director

Operator Signature

Date Signed

Name and Official Title (Type or print)

XIX. Comments

Current documents requested in Sections XV, XVI, and XVII are on file with the agency

Ferro will acquire certain equipment, buildings and improvements associated with the manufacturing facility and lease only a portion of the Solutia Inc. site that lies

beneath the acquired equipment, buildings and improvements. Solutia Inc. will continue to own and operate the remainder of the site, including the property underlying Solid

Waste Management Units Nos. 1,2,3,4,5,6, and 14. All SWMUs on the entire site will continue to be address in Solutia's Hazardous and Solid Waste Amendment ("HSWA") Permit No. NJD 001

700 707

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

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XVIII. Certification(s)

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Owner Signature

Date Signed

Name and Official Title (Type or print)

Edward S. Frindt, Jr. North American Manufacturing Director

Owner Signature

Date Signed

Name and Official Title (Type or print)

Dennis L. Canner Vice President-Operations Excellence and Environmental, Safety and Health

Operator Signature

Date Signed

Name and Official Title (Type or print)

Edward S. Frindt, Jr. North American Manufacturing Director

Operator Signature

Date Signed

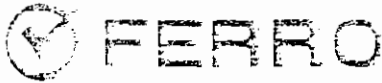
Name and Official Title (Type or print)

XX. Comments

Current documents requested in Sections IV, XVI, and XVII are on file with the agency

Ferro will acquire certain equipment, buildings and improvements associated with the manufacturing facility and lease only a portion of the Solutia Inc. site that lies beneath the acquired equipment, buildings and improvements. Solutia Inc. will continue to own and operate the remainder of the site, including the property underlying Solid Waste Management Units Nos. 1,2,3,4,5,6, and 14. All SWMUs on the entire site will continue to be address in Solutia's Hazardous and Solid Waste Amendment ("HSWA") Permit No. NJD 001 700 707.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)



POLYMER ADDITIVES DIVISION
FERRO CORPORATION

7050 KRICK ROAD
WALTON HILLS, OHIO 44146-4494
TELEPHONE: (216) 641-8580
FACSIMILE: (216) 750-6729

Fer-10

NJR 000035865

August 15, 2000

VIA OVERNIGHT MAIL

Kathleen Callahan, Director
Division of Environmental Planning and Protection
United States Environmental Protection Agency
290 Broadway - 25th Floor
New York, New York 10007

Re: Class I Modification of Solutia Inc. Hazardous and Solid Waste Amendments Permit
EPA ID No. NJD 001 700 707 *(Solutia's #)*

Dear Director Callahan:

Ferro Corporation ("Ferro") has been advised by the United States Environmental Protection Agency, Region 2 ("USEPA") that Ferro is required to obtain a Class 1 Modification of the referenced HSWA Permit in order for Ferro to commence operations after closing on August 18, 2000, in accordance with HSWA requirements. Without waiving any rights, Ferro and Solutia have agreed to submit this request for a Class 1 Modification of Solutia Inc.'s ("Solutia") existing HSWA Permit. Thus, Ferro is requesting this Class I modification, although Ferro will have neither operational control nor any ownership interest in substantial portions of the property currently owned by Solutia, which contain the Hazardous and Solid Waste Amendment ("HSWA") Solid Waste Management Units ("SWMUs"), as identified in Attachment 1, including, but not limited to, SWMUs known as the East Landfill and Past Disposal Area 1. Ferro only will have operational control over the manufacturing portion of the Facility, which Ferro will lease. In summary, without waiving any rights and preserving all claims, Ferro and Solutia have agreed to submit this request for a Class 1 Modification in order to close the transaction described in more detail below.

Ferro hereby requests, pursuant to 40 C.F.R. §§ 270.40-270.42, the modification of Solutia's Hazardous and Solid Waste Amendments ("HSWA") Permit EPA ID No. NJR 000035865 (the "HSWA Permit"). Ferro is submitting this request in connection with Ferro's contemplated leasehold and acquisition of the manufacturing process portion of the site (the "Ferro Site"). (See Attachment 1) The Ferro Site and adjoining property, currently owned and operated by Solutia, are located at Route 130 South, Bridgeport, New Jersey (the "Facility").

PR\323206\4
8/10/2000 6:23 PM



Kathleen Callahan, Director

Page 2

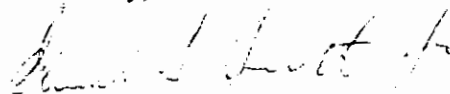
Specifically, Ferro and Solutia have entered into an asset purchase agreement, whereby certain equipment, buildings, and other improvements at the Ferro Site will be purchased by Ferro on August 18, 2000, subject to the satisfaction of applicable closing conditions. The property underlying these improvements located on the Ferro Site, presently owned by Solutia, initially will be leased by Ferro and later acquired by Ferro. Solutia will retain the adjoining portions of the Facility, which contain the Hazardous and Solid Waste Amendment ("HSWA") Solid Waste Management Units ("SWMUs") identified in Attachment 1 and the Tetrathal Process production building. Ferro will operate the Tetrathal Process under terms of an agreement with Solutia. Some of the SWMUs and the Tetrathal Process Production building are generally identified on the map found at Attachment 2.

USEPA Region 2 has advised Ferro that Ferro must request this Class I Permit Modification of the HSWA Permit to reflect the altered owner/operator status at the Facility in order to comply with 40 CFR §270.42. We have enclosed as Exhibit A, a written agreement between Solutia and Ferro containing, among other things, a specific date for establishment of the shared HSWA Permit responsibilities. In addition, enclosed as Exhibit B is a Part A Permit Application Amendment, revised only to reflect the contemplated change of ownership and operational control of equipment, buildings, and improvements at the Ferro Site portion of the Facility from Solutia to Ferro, exclusive of the SWMUs in Attachment 1. Ferro's operations will continue consistent with the current Part B. After the closing, Ferro agrees to submit to USEPA a copy of the relevant transactional portions of the asset purchase agreement and the lease of the Ferro Site portion of the Facility with Solutia.

This request for a Class I Modification applies only to the HSWA Permit. Under separate cover, Ferro submitted a request to the NJDEP for the modification of Solutia's Hazardous Waste Facility Permit pursuant to a Class I Modification.

Thank you for your cooperation and assistance. Should you have any questions, or if we may provide you with any additional information to facilitate the approval of Ferro's Class I Modification request, please contact Ferro's local counsel, Ellen Radow Sadat, Esquire at (609) 716-6611.

Sincerely,



Edward S. Frindt, Jr.
North American Manufacturing
Director

Kathleen Callahan, Director

Page 3

cc: Mr. Barry Tornick, USEPA
Ms. Agathe Nadai, USEPA
Robert Hazen, Assistant Regional Counsel, USEPA
Ellen Radow Sadat, Esquire
Mr. Dennis L. Cavner
Mr. David Krawczyk
Elton Parker, Esquire
Mr. Richard A. Santo, Jr.
Robert F. Wilkinson, Esquire

Kathleen Callahan, Director

Page 4

Exhibit A – Agreement between Solutia and Ferro for the Class I Modification of the Solutia
Hazardous and Solid Waste Amendments Permit

Exhibit B – Part A Permit Application Amendment

Attachment 1

SWMU No. 1	Past Disposal Area #1
SWMU No. 2	Past Disposal Area #2
SWMU No. 3	Past Disposal Area #3
SWMU No. 4	Phenol Equalization Lagoon (PEL)
SWMU No. 5	Sludge Lagoon No. 3
SWMU No. 6	Sludge Lagoon No. 4
SWMU No. 14	East Landfill

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit

Application

Part A

(Read the instructions before starting)

Date Received		
Month	Day	Year

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

<input type="checkbox"/> A. First Part A Submission	<input checked="" type="checkbox"/> B. Part A Amendment #
---	---

C. Installation's EPA ID Number D. Secondary ID Number (if applicable)

NJD 001 700 707 NJR 000 035 865

II. Name of Facility Ferro Corporation

Route 130 South α Center SQ. 25 MIN

III. Facility Location (Physical address not P.O. Box or Route Number)

A. Street

Street (Continued)

City or Town

State

Zip Code

Bridgeport

NJ

08014

County Code (if known)

County Name

Gloucester

B. Land Type

C. Geographic Location

D. Facility Existence Date

(Enter code)

LATITUDE (Degrees, Minutes, & Seconds) LONGITUDE (Degrees, Minutes & Seconds)

Month Day Year

P

39-47'30"

75-23'45"

11/19/61

IV. Facility Mailing Address

Street or P.O. Box

Route 130 South P. O. Box 309.

City or Town

State

Zip Code

Bridgeport

NJ

08014

V. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (Last)

(First)

Evang

Charles

Job Title

Phone Number (Area Code and Number)

Sr. Environmental Specialist

856-467-8266

VI. Facility Contact Address (See instructions)

A. Contact Address

B. Street or P.O. Box

Location Mailing Other

☒ ☒ ☐

City or Town

State

Zip Code

Name of Operator				
Ferro Corporation				
Street or P.O. Box 1000 Lakeside Avenue				
City or Town Cleveland			State OH	ZIP Code 44113
Phone Number (Area Code and Number)		B. Operator Type <div style="border: 1px solid black; padding: 2px; display: inline-block;">P</div>	C. Change of Operator Indicator Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
			Date Changed Month Day Year 08 / 18 / 00	
VIII. Facility Owner (See Instructions)				
A. Name of Facility's Legal Owner				
Solutia, Inc.				
Street or P.O. Box				
575 Maryville Center Drive, Mail Zone 6-S				
City or Town St. Louis,			State MO	ZIP Code 63141
Phone Number (Area Code and Number)		B. Owner Type <div style="border: 1px solid black; padding: 2px; display: inline-block;">P</div>	C. Change of Owner Indicator Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
			Date Changed Month Day Year / /	
IX. SIC Codes (4-digit, in order of significance)				
Primary		Secondary		
2865	(Description) Organic Chemicals		(Description)	
Secondary		Secondary		
2812	(Description) Inorganic Chemicals		(Description)	
X. Other Environmental Permits (See Instructions)				
A. Permit Type (Enter code)		B. Permit Number		C. Description
N		NJD 0005045 (NJ00012)		NJPDES Discharge to surface water
		No. 0809A1HP03		New Jersey Hazardous Waste Facility
		NJD 001 700 707		HRSA Permit EPA Reg. II
E		NJ 00012		Facility Wide Permit
F		NJ 00012		Numerous state permits to operate
				air emission control devices
E		2099P (NJ 00012)		Water diversion permit

XI. Nature of Business (Provide a brief description)

Facility produces organic chemicals for internal use and sales. Principle products are Phthalate and Phosphate Ester Plasticizers, Benzyl Chloride, Hydraulic Fluids and Tetrachlorophthalic Anhydride and inorganic product, Hydrochloric Acid is also produced.

XII. Process Codes and Design Capacities

- A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.
- B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.
1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
D80	Landfill	Acre-feet or Hectare-meter	T88	Titanium Dioxide Chloride Process Oxidation Reactor	
D81	Land Treatment	Acres or Hectares	T89	Methane Reforming Furnace	
D82	Ocean Disposal	Gallons Per Day; Liters Per Day	T90	Pulping Liquor Recovery Furnace	
D83	Surface Impoundment	Gallons or Liters	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
D99	Other Disposal	Any Unit of Measure Listed Below	T92	Halogen Acid Furnaces	Cubic Yards or Cubic Meters
S01	Storage:		T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters	T94	Containment Building-Treatment Miscellaneous (Subpart X):	
S02	Tank	Gallons or Liters	X01	Open Burning/Open Detonation	
S03	Waste Pile	Cubic Yards or Cubic Meters	X02	Mechanical Processing	
S04	Surface Impoundment	Gallons or Liters	X03	Thermal Unit	Any Unit of Measure Listed Below
S05	Drip Pad	Gallons or Liters			
S06	Containment Building-Storage	Cubic Yards or Cubic Meters			
S99	Other Storage	Any Unit of Measure Listed Below			
T01	Treatment:				
T01	Tank	Gallons Per Day or Liters Per Day			Cubic Yards or Cubic Meters
T02	Surface Impoundment	Gallons Per Day or Liters Per Day			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour			
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T80	Boller	Gallons or Liters			
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	X04	Geologic Repository	Any Unit of Measure Listed Below
T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	X99	Other Subpart X	
T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T84	Phosphate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			
T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour			

VII. Operator Information (See Instructions)

Name of Operator

Ferro Corporation

Street or P.O. Box 1000 Lakeside Avenue

City or Town Cleveland

State

ZIP Code

OH

44113

Phone Number (Area Code and Number)

B. Operator Type

C. Change of Operator Indicator

Date Changed Month Day Year

P

Yes

X

No

08 / 18 / 00

VIII. Facility Owner (See Instructions)

A. Name of Facility's Legal Owner

Ferro Corporation

Street or P.O. Box 1000 Lakeside Avenue

City or Town Cleveland

State

ZIP Code

OH

44113

Phone Number (Area Code and Number)

B. Owner Type

C. Change of Owner Indicator

Date Changed Month Day Year

P

Yes

X

No

08 / 18 / 00

IX. SIC Codes (4-digit, in order of significance)

Primary

Secondary

2865

(Description)

Organic Chemicals

(Description)

Secondary

Secondary

2812

(Description)

Inorganic Chemicals

(Description)

X. Other Environmental Permits (See Instructions)

A. Permit Type (Enter code)

B. Permit Number

C. Description

N

NJD 0005045 (NJ00012)

NJPDES Discharge to surface water

No. 0809A1HP03

New Jersey Hazardous Waste Facility

NJD 001 700 707

HSWA Permit EPA Reg. II

E

NJ 00012

Facility Wide Permit

E

NJ 00012

Numerous state permits to operate air emission control devices

E

2099P (NJ 00012)

Water diversion permit

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item XIV-D(1).
- Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

- PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form (D(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS									
							(1) PROCESS CODES (Enter code)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))				
X 1	K	0	5	4	900	P	T	0	3	D	8	0				
X 2	D	0	0	2	400	P	T	0	3	D	8	0				
X 3	D	0	0	1	100	P	T	0	3	D	8	0				
X 4	D	0	0	2												Included With Above

XII. Process Codes and Design Capabilities(Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only
		1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	S 0 2	533,788	G	0 0 1	
X 1	S 0 1	15,400	G	0 0 1	
X 2	S 0 2	6,900	G	0 0 1	
3					
4					
5					
6					
7					
8					
9					
1 0					
1 1					
1 2					
1 3					

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item XIII.

XIII. Other Processes(Follow instructions from Item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter the line number)	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
		1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	T 0 4				In-situ Verification
1					
2					
3					
4					

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature

Date Signed

Name and Official Title (Type or print)

Edward S. Frindt, Jr. North American Manufacturing Director

Owner Signature

Date Signed

Name and Official Title (Type or print)

Dennis L. Canner Vice President-Operations Excellence and Environmental, Safety and Health

Operator Signature

Date Signed

Name and Official Title (Type or print)

Edward S. Frindt, Jr. North American Manufacturing Director

Operator Signature

Date Signed

Name and Official Title (Type or print)

XIX. Comments

Current documents requested in Sections IV, XVI, and XVII are on file with the agency

Ferro will acquire certain equipment, buildings and improvements associated with the manufacturing facility and lease only a portion of the Solutia Inc. site that lies

beneath the acquired equipment, buildings and improvements. Solutia Inc. will continue

to own and operate the remainder of the site, including the property underlying Solid

Waste Management Units Nos. 1,2,3,4,5,6, and 14. All SWMUs on the entire site will continue

to be address in Solutia's Hazardous and Solid Waste Amendment ("HSWA") Permit No. NJD 001

700.707.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature

Edward S. Frindt, Jr.

Date Signed

8-10-00

Name and Official Title (Type or print)

Edward S. Frindt, Jr. North American Manufacturing Director

Owner Signature

Date Signed

Name and Official Title (Type or print)

Dennis L. Canner Vice President-Operations Excellence and Environmental, Safety and Health

Operator Signature

Edward S. Frindt, Jr.

Date Signed

8-10-00

Name and Official Title (Type or print)

Edward S. Frindt, Jr. North American Manufacturing Director

Operator Signature

Date Signed

Name and Official Title (Type or print)

XIX. Comments

Current documents requested in Sections XV, XVI, and XVII are on file with the agency. Ferro will acquire certain equipment, buildings and improvements associated with the manufacturing facility and lease only a portion of the Solutia Inc. site that lies beneath the acquired equipment, buildings and improvements. Solutia Inc. will continue to own and operate the remainder of the site, including the property underlying Solid Waste Management Units Nos. 1,2,3,4,5,6, and 14. All SWMUs on the entire site will continue to be address in Solutia's Hazardous and Solid Waste Amendment ("BSWA") Permit No. NJD 001

700 707

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES										
	(1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))															
1	D	0	0	1	2.0x10 ⁶	P	S	0	2								
2	F	0	3	9	4.0x10 ⁶	P											Landfill Leachate
3	K	0	1	5	0.7x10 ⁶	P	S	0	2								
4	D	0	3	2	0.2x10 ⁶	P	S	0	1								
5	P	0	2	8	50x10 ³	P	S	0	1								
6	U	1	9	0	10x10 ³	P	S	0	1								
7	U	1	8	8	1x10 ³	P	S	0	1								
8	D	0	0	2	1x10 ³	P	S	0	1								
9	D	0	0	9	1x10 ³	P	S	0	1								
10	D	0	1	8	1x10 ³	P	S	0	1								
11	F	0	0	3	20x10 ³	P	S	0	2								
12	F	0	0	5	10x10 ³	P	S	0	1								
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**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

07/24/00

This is to acknowledge that you have filed a **Notification of Hazardous Waste Activity** for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER	→	NJR000035865
INSTALLATION NAME	→	FERRO CORP
INSTALLATION ADDRESS	→	RTE 130 S & CENTER SQ .25 MI N MILE MARKER 9.5 BRIDGEPORT, NJ 08014
MAILING ADDRESS	→	PO BOX 309 BRIDGEPORT, NJ 08014-0309

EPA Form 8700-12AB (4-80)

**USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866**

**ATTN: JACK HOYT
Tel : (212) 637-4106
Fax: (212) 637-4949**

**TO: FERRO CORP or Current Occupant
ATTN: EVANS, CHARLES - SR ENV SPEC
PO BOX 309
BRIDGEPORT, NJ 08014-0309**



James E. McGreevey
Governor

State of New Jersey
Department of Environmental Protection
Division of Environmental Safety and Health
PO Box 424
Trenton, NJ 08625-0424
Phone: (609) 633-7964
Fax: (609) 777-1330

Bradley M. Campbell
Commissioner

August 6, 2003

Mr. Ralph Nylund
Ferro Corporation
Route 130 South
PO Box 309
Bridgeport, New Jersey 08014-0309

Re: Hazardous Waste Permit Renewal Notice
Ferro Corporation
Logan Township, Gloucester County
EPA ID No.: NJR 000 035 865
Facility-wide Permit (FWP) No.: NJ0012

Dear Mr. Nylund:

This letter is to notify you that the hazardous waste portion of the FWP for the above referenced facility is due to expire on June 1, 2004. Therefore, in accordance with 40 C.F.R. 270.10(h), to continue operation of the hazardous waste facility in your FWP after the expiration date, Ferro Corporation must submit a new application to the Office of Pollution Prevention and Right to Know prior to December 1, 2003.

The application shall be prepared in accordance with the requirements of N.J.A.C. 7:26G-12 and 40 C.F.R. 270. Note that significant changes have been made to the regulations since the submittal of your last complete hazardous waste facility application in 1993, by the then owner Monsanto. Submission of a copy of your previous application will not satisfy the present application requirements. A new application document is required and should reference all applicable CAR codes, new facility contacts, site maps, etc. Please note, Ferro does not need to re-submit its ownership change documents.


Note that failure to submit the application will result in noncompliance with your present FWP, which could result in termination of the permit in accordance with 40 C.F.R. 270.43 and closure of all hazardous waste management units in accordance with 40 C.F.R. 264.112(d)(3).

Should you have any questions regarding this matter or should you wish to set up a pre-application meeting to discuss the permit application requirements, please contact Michele Viventi or me at (609) 777-0518.

Sincerely,

Sharon Davis

Sharon Davis
Facility-wide Permit Program

C: Michael Digiore, OPPRTK
Michele Viventi, FWP

Robert Gomez, BHWCE - Southern Region
Anthony Fontana, Bureau of Hazardous Waste and Transfer Facilities

DrinkerBiddle&Shanley

A Pennsylvania Limited Liability Partnership

U.S. EPA
AGENCY RO II
00 JUL 18 AM 11:46
Ellen Radow Sadat
609-716-6611
sadat@dbi.com
GRAMS BRANCH

105 College Road East
Suite 300
P.O. Box 627
Princeton, NJ
08542-0627

609-716-6500
609-799-7000 FAX
www.dbr.com

PRINCETON
FLORHAM PARK

DrinkerBiddle&Reath LLP
PHILADELPHIA
WASHINGTON
NEW YORK

July 18, 2000

VIA OVERNIGHT MAIL

Mr. Jack Hoyt
United States Environmental Protection Agency
290 Broadway, 22nd Floor
New York, New York 10007-1866

RE: Notification of Regulated Waste Activity
Ferro Corporation

Dear Mr. Hoyt:

As we discussed, on July 31, 2000 Ferro Corporation will be commencing operations at the facility, which is currently operated by Solutia Inc. Solutia Inc will continue to own a portion of the property and will be generating waste from that portion of the property. Therefore, Solutia has requested that it continue to maintain EPA ID# NJD001700707.

Ferro Corporation requests its own ID# as related to hazardous waste which may be generated from the facility operations. Please provide this ID# as soon as possible as this ID# is required to complete the RCRA Part A Class 1 modification which Ferro needs to operate a storage tank and drum storage area.

Please provide me and Mr. Frindt of Ferro Corporation in Walton Hills, Ohio with the new ID# as soon as possible.

Very truly yours,



Ellen Radow Sadat

Samuel W. Lambert, III
Partner responsible
for Princeton Office

ERS/ds
Enclosure

150th
ANNIVERSARY
1849-1999

PK3227861

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

00 JUL 13
11:46

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. Initial Notification

☒

B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

00000000000000000000

II. Name of Installation (Include company and specific site name)

F E R R O C O R P O R A T I O N

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

R O U T E 1 3 0 S O U T H

Street (Continued)

M I L E M A R K E R 9.5 / .25 miles N. of Center Square

City or Town

State

Zip Code

B R I D G E P O R T

N J

0 8 0 1 4 - 0 3 0 9

County Code

County Name

G L O U C E S T E R

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

S A M E

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

E V A N S

C H A R L E S

Job Title

Phone Number (Area Code and Number)

S R E N V I R O N S P E C

8 5 6 - 4 6 7 - 8 2 6 6 Ext: ...

VI. Installation Contact Address (See instructions)

FAX: (856) 467 - 8308

A. Contact Address Location

Mailing

☒☒

B. Street or P.O. Box

P O B O X 3 0 9

City or Town

State

Zip Code

B R I D G E P O R T

N J

0 8 0 1 4 - 0 3 0 9

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

F E R R O C O R P O R A T I O N

Street, P.O. Box, or Route Number

1 0 0 0 L A K E S I D E A V E N U E

City or Town

State

Zip Code

C L E V E L A N D

O H

4 4 1 1 3 -

Phone Number (Area Code and Number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

Date Changed

2 1 6 - 7 5 0 - 6 7 6 3

P

P

Yes

No

Month Day Year

0 7 3 1 2 0 0 0

EPA Form 8700-12 (Rev. 12/99)

PLEASE REPLY TO: JACK HOYT, USEPA, 290 BROADWAY, 22ND FLOOR
NEW YORK CITY, NEW YORK. 10007-1866 PHONE: (212) 637-4106

change (owner)
609 776 6647
Required owner name, VRS DLP

00 JUL 19 AM 11:47

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities

C. Used Oil Management Activities

1. Generator (See Instructions)
- ☒ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☒ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____
- ☒ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see Instructions.
4. Exempt Boiler and/or Industrial Furnace
- ☐ a. Smelting, Melting, and Refining Furnace Exemption
- ☐ b. Small Quantity On-Site Burner Exemption
- ☐ 5. Underground Injection Control

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility
2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Processor
- ☐ b. Re-refiner
- ☐ 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

B. Universal Waste Activity

☐ Large Quantity Handler of Universal Waste

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

1 K 0 1 5	2 P 0 2 8	3 U 1 9 0	4 U 1 8 8	5 F 0 0 3	6 F 0 0 5
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See Instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

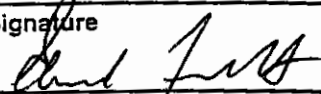
1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D 0 0 1	D 0 1 8	D 0 0 2	D 0 0 9

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See Instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature 	Name and Official Title (Type or print) Edward S. Frindt, Jr. North American Manufacturing Director	Date Signed 7-18-00
--	---	------------------------

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 13, 2014 - 12:23 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJR000035865	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 08/13/2014		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:8 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 13, 2014 - 12:23 PM

Page 2

FERRO CORP

County Name / Code: GLOUCESTER / NJ015

NJR000035865

REGION 02

Location: 170 RT 130 S; BRIDGEPORT, NJ 08014

Mailing: 170 RT 130 S; PO BOX 309; BRIDGEPORT, NJ 08014

Activity Location: NJ	State District: SOUTHERN	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: Y
Generator: LQG	Transporter: N	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW):+ / +	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ---	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrld: N	State TSDF: -----	State Addressed SNC: Y	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Location:	Activity Location: NJ	Type: 262.C	Determined Date: 03/31/2012	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 04/19/2012		Actual Compliance Date: 03/31/2012	RTC Qualifier: OBSERVED	Sequence Number: 9
Citation Information:	Seq #	Type	Citation		
	1	FEDERAL REGULATION	262.34(a)(3)		
CEI Evaluation	03/31/2012	Activity Location: NJ	By: State	Identifier: 001	Person: SOTF
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 03/31/2012
					Found Violation: YES
					Focus Area:
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 09/18/2012	Identifier: 001	
	Docket:	Agency: State	Responsible Person: SOPCT	Branch:	
	Penalty Information: Proposed:	Final Monetary: \$5,400	Collected: \$5,400	Total Final: \$5,400	
	CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 07/31/2012	Identifier: 001	
	Docket:	Agency: State	Responsible Person: SOTF	Branch:	
	Penalty Information: Proposed: \$6,750	Final Monetary:	Collected:	Total Final:	
	CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 04/04/2012	Identifier: 001	
	Docket:	Agency: State	Responsible Person: SOTF	Branch:	
	CA Component: Y	Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Violation:	Activity Location: NJ	Type: 262.C	Determined Date: 03/31/2012	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 05/04/2012		Actual Compliance Date: 03/31/2012	RTC Qualifier: OBSERVED	Sequence Number: 10
Citation Information:	Seq #	Type	Citation		
	1	FEDERAL REGULATION	262.34(a)(2)		
CEI Evaluation	03/31/2012	Activity Location: NJ	By: State	Identifier: 001	Person: SOTF
	Citizen Complaint: NO	Multimedia Inspection: NQ	Sampling: NO	Not Subtitle C: NO	Day Zero: 03/31/2012
					Found Violation: YES
					Focus Area:
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 09/18/2012	Identifier: 001	
	Docket:	Agency: State	Responsible Person: SOPCT	Branch:	
	Penalty Information:	Penalty Information Printed Above			
	CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 13, 2014 - 12:23 PM

Page 3

FERRO CORP, NJR000035865, BRIDGEPORT, NJ, continued -

Enforcement:	Activity Location: NJ	Type: 210	Action Date: 07/31/2012	Identifier: 001
Docket:		Agency: State	Responsible Person: SOTF	Branch:
Penalty Information: Penalty Information Printed Above				
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 04/04/2012	Identifier: 001
Docket:		Agency: State	Responsible Person: SOTF	Branch:
CA Component: Y	Disposition Status:		Appeal Initiated:	Appeal Resolved:

Violation:	Activity Location: NJ	Type: 262.C	Determined Date: 06/24/2010	Determined by Agency: State	Responsible Agency: State
Scheduled Compliance Date: 06/24/2010		Actual Compliance Date: 06/24/2010		RTC Qualifier: OBSERVED	
Citation Information: Seq #		Type	Citation		
1		FEDERAL REGULATION	262.34(a)(3)		
CEI Evaluation	06/24/2010	Activity Location: NJ	By: State	Identifier: 001	Person: SOTF
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 06/24/2010	Found Violation: YES
Focus Area:					

Enforcement:	Activity Location: NJ	Type: 310	Action Date: 09/02/2010	Identifier: 001
Docket:		Agency: State	Responsible Person: SOTF	Branch: S
Penalty Information: Proposed: Final Monetary: \$3,600 Collected: Total Final: \$3,600				
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 07/23/2010	Identifier: 001
Docket:		Agency: State	Responsible Person: SOTF	Branch: S
Penalty Information: Proposed: \$3,600 Final Monetary: Collected: Total Final:				
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 06/24/2010	Identifier: 001
Docket:		Agency: State	Responsible Person: SOTF	Branch: S
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:

Violation:	Activity Location: NJ	Type: 262.C	Determined Date: 12/28/2007	Determined by Agency: State	Responsible Agency: State
Scheduled Compliance Date: 12/27/2007		Actual Compliance Date: 12/27/2007		RTC Qualifier: OBSERVED	
Citation Information: Seq #		Type	Citation		
1		FEDERAL REGULATION	262.34(a)(2)		
CEI Evaluation	12/28/2007	Activity Location: NJ	By: State	Identifier: 001	Person: SOANM
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 12/28/2007	Found Violation: YES
Focus Area:					

Enforcement:	Activity Location: NJ	Type: 310	Action Date: 01/24/2008	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
Penalty Information: Proposed: Final Monetary: \$4,500 Collected: Total Final: \$4,500				
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 13, 2014 - 12:23 PM

Page 4

FERRO CORP, NJR000035865, BRIDGEPORT, NJ, continued -

Enforcement:	Activity Location: NJ	Type: 210	Action Date: 01/11/2008	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
Penalty Information: Proposed: \$4,500		Final Monetary:	Collected:	Total Final:
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 12/16/2004	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Violation:	Activity Location: NJ	Type: 273.B	Determined Date: 12/28/2007	Determined by Agency: State
Scheduled Compliance Date: 12/27/2007		Actual Compliance Date: 12/27/2007	RTC Qualifier: OBSERVED	Responsible Agency: State
Citation Information: Seq #		Type	Citation	
1		FEDERAL REGULATION	273.15(c)	
2		FEDERAL REGULATION	273.14(a)	
CEI Evaluation	12/28/2007	Activity Location: NJ	By: State	Identifier: 001
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Person: SOANM
			Not Subtitle C: NO	Branch: S
			Day Zero: 12/28/2007	Found Violation: YES
				Focus Area:
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 01/24/2008	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
Penalty Information: Penalty Information Printed Above				
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 01/11/2008	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
Penalty Information: Penalty Information Printed Above				
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 12/16/2004	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 12/16/2004	Determined by Agency: State
Scheduled Compliance Date: 01/16/2005		Actual Compliance Date: 12/27/2007	RTC Qualifier: OBSERVED	Responsible Agency: State
CDI Evaluation	12/16/2004	Activity Location: NJ	By: State	Identifier: 001
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Person: SOANM
			Not Subtitle C: NO	Branch: S
			Day Zero:	Found Violation: YES
				Focus Area:
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 01/24/2008	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
Penalty Information: Penalty Information Printed Above				
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 01/11/2008	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
Penalty Information: Penalty Information Printed Above				
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 13, 2014 - 12:23 PM

Page 5

FERRO CORP, NJR000035865, BRIDGEPORT, NJ, continued -

Enforcement:	Activity Location: NJ	Type: 120	Action Date: 12/16/2004	Identifier: 001
Docket:		Agency: State	Responsible Person: SOANM	Branch: S
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:

Evaluations With No Violations:

CEI Evaluation 04/29/2014	Activity Location: NJ	By: State	Identifier: 001	Person: SOAS	Branch:	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 04/29/2014		Focus Area:
SNN Evaluation 03/31/2012	Activity Location: NJ	By: State	Identifier: 003	Person: SOPCT	Branch:	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
SNY Evaluation 03/31/2012	Activity Location: NJ	By: State	Identifier: 002	Person: SOTF	Branch:	Found Violation: N/A
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 03/31/2012		Focus Area:
SNN Evaluation 06/25/2010	Activity Location: NJ	By: State	Identifier: 001	Person: SOTF	Branch: S	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
SNY Evaluation 06/24/2010	Activity Location: NJ	By: State	Identifier: 002	Person: SOTF	Branch: S	Found Violation: N/A
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 06/24/2010		Focus Area:
CEI Evaluation 06/04/2009	Activity Location: NJ	By: EPA	Identifier: 001	Person: R2OSK	Branch: RCB	Found Violation: U
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 06/04/2009		Focus Area:
CEI Evaluation 06/09/2005	Activity Location: NJ	By: State	Identifier: 001	Person: SOTWO	Branch: S	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
NRR Evaluation 01/12/2005	Activity Location: NJ	By: State	Identifier: 001	Person: SOANM	Branch: S	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation 06/30/2004	Activity Location: NJ	By: State	Identifier: 001	Person: COPCT	Branch: C	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation 03/26/2003	Activity Location: NJ	By: State	Identifier: 001	Person: SOPCT	Branch: S	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CDI Evaluation 12/06/2001	Activity Location: NJ	By: State	Identifier: 001	Person: SOMPG	Branch: S	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 13, 2014 - 12:23 PM

Page 6

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 13, 2014 - 12:23 PM

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL
262.C	GENERATORS - PRE-TRANSPORT
273.B	UNIVERSAL WASTE - SMALL QUANTITY HANDLERS

Evaluation Type	Type Description
CDI	CASE DEVELOPMENT INSPECTION
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
NRR	NON-FINANCIAL RECORD REVIEW
SNN	NOT A SIGNIFICANT NON-COMPLIER
SNY	SIGNIFICANT NON-COMPLIER

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FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 13, 2014 - 12:23 PM

Page 8

Description of codes used on the report:

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL
210	INITIAL 3008(A) COMPLIANCE
310	FINAL 3008(A) COMPLIANCE ORDER

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